

FILED
U.S. BANKRUPTCY COURT

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

2017 JUL 13 A 9:35

In Re:
Neelam Taneja,
Debtor.

Case No.: 16-12356
Chapter: 13
Adv. no. 17-01027

ANSWER AND OBJECTION TO SUPPLEMENTAL MOTION


Comes now, Defendant, Neelam Uppal files an objection to new supplemental motion
filed by and

Defendant relies on variety of grounds in support of submission

1. The adversary proceeding pursuant Bankruptcy rule 7001 (2) and (8) and 362 (a) (h) is a valid case and not a frivolous matter.
2. The Creditors, after being served with the notice of new Bankruptcy, as willful violation of the automatic Stay, fraud and corruption and conspiracy are obtaining such an order to enforce debt.
3. The Creditor already took the money, \$9000.00 as retainer for one pleading..
4. The Creditor has fabricated bill after termination since 2012.
5. This court has Jurisdiction pending Bankruptcy. The Creditor has not obtained relief under this bankruptcy.
6. Creditor's Judgment is invalid pursuant to 18 USC 1001 and F.S 1540 as it was obtained by fraudulent means by producing fake orders.
7. The creditor does not have final order as it is on appeal.

8. Wherefore, the debtor requests that the creditor's motion be denied and quashed and an injunction be entered against the creditor and Seminole County Court for any further judgement.

Respectfully submitted


NEELAM UPPAL, PRO SE

DECLARATION

The undersigned Debtor named in the foregoing Motion to Continue Automatic Stay as to All Creditor hereby makes a solemn oath that thatements contained here are true and correct to the best of the Debtor's knowlwdge, information and belief.

Respectfully submitted,

Date: 7/13/17



Neelam Taneja, Debtor *Pro se*.

**1370 Broadway, #504
NEW YORK, NY-10018
PH.- (646)-740-9141**

CERTIFICATION

This is to certify that a true copy has been sent to:
Barry Wilkinson, 696 1st ave, suite 201, St. Petersburg, FL-33701
& PO box 8102, Madiera Beach, FL



Neelam Uppal
PO box 1002,
Largo, FL 33779
727-403-0022

MEMORANDUM OF LAW

Cornell Law School

Federal Rules of Bankruptcy Procedure › PART VII—ADVERSARY PROCEEDINGS › Rule 7001. Scope of Rules of Part VII

Rule 7001. Scope of Rules of Part VII



An adversary proceeding is governed by the rules of this Part VII. The following are adversary proceedings:

- (1) a proceeding to recover money or property, other than a proceeding to compel the debtor to deliver property to the trustee, or a proceeding under §554(b) or §725 of the Code, Rule 2017, or Rule 6002;
- (2) a proceeding to determine the validity, priority, or extent of a lien or other interest in property, other than a proceeding under Rule 4003(d);
- (3) a proceeding to obtain approval under §363(h) for the sale of both the interest of the estate and of a co-owner in property;
- (4) a proceeding to object to or revoke a discharge, other than an objection to discharge under §§727(a)(8), ¹ (a)(9), or 1328(f);
- (5) a proceeding to revoke an order of confirmation of a chapter 11, chapter 12, or chapter 13 plan;
- (6) a proceeding to determine the dischargeability of a debt;
- (7) a proceeding to obtain an injunction or other equitable relief, except when a chapter 9, chapter 11, chapter 12, or chapter 13 plan provides for the relief;
- (8) a proceeding to subordinate any allowed claim or interest, except when a chapter 9, chapter 11, chapter 12, or chapter 13 plan provides for subordination;
- (9) a proceeding to obtain a declaratory judgment relating to any of the foregoing; or
- (10) a proceeding to determine a claim or cause of action removed under 28 U.S.C. §1452.

NOTES

(As amended Mar. 30, 1987, eff. Aug. 1, 1987; Apr. 30, 1991, eff. Aug. 1, 1991; Apr. 26, 1999, eff. Dec. 1, 1999; Apr. 28, 2010, eff. Dec. 1, 2010.)

NOTES OF ADVISORY COMMITTEE ON RULES—1983

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18 USC 1001: Statements or entries generally

Text contains those laws in effect on July 11, 2017

From Title 18-CRIMES AND CRIMINAL PROCEDURE

PART I-CRIMES

CHAPTER 47-FRAUD AND FALSE STATEMENTS

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§1001. Statements or entries generally

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully-

- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
- (2) makes any materially false, fictitious, or fraudulent statement or representation; or
- (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry;

shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.

(b) Subsection (a) does not apply to a party to a judicial proceeding, or that party's counsel, for statements, representations, writings or documents submitted by such party or counsel to a judge or magistrate in that proceeding.

(c) With respect to any matter within the jurisdiction of the legislative branch, subsection (a) shall apply only to-

- (1) administrative matters, including a claim for payment, a matter related to the procurement of property or services, personnel or employment practices, or support services, or a document required by law, rule, or regulation to be submitted to the Congress or any office or officer within the legislative branch; or
- (2) any investigation or review, conducted pursuant to the authority of any committee, subcommittee, commission or office of the Congress, consistent with applicable rules of the House or Senate.

(June 25, 1948, ch. 645, 62 Stat. 749 ; Pub. L. 103-322, title XXXIII, §330016(1)(L), Sept. 13, 1994, 108 Stat. 2147 ; Pub. L. 104-292, §2, Oct. 11, 1996, 110 Stat. 3459 ; Pub. L. 108-458, title VI, §6703(a), Dec. 17, 2004, 118 Stat. 3766 ; Pub. L. 109-248, title I, §141(c), July 27, 2006, 120 Stat. 603 .)